

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

**January 2020 GRAND JURY
(Impaneled 01/03/2020)**

THE UNITED STATES OF AMERICA

INDICTMENT

-vs-

SAMUEL MARA

Violations:

Title 18, United States Code,
Sections 875(c) and 2261A(2)(B)
(2 Counts)

COUNT 1

(Threats by Interstate Communications)

The Grand Jury Charges That:

On or about June 6, 2020, in the Western District of New York, and elsewhere, the defendant, **SAMUEL MARA**, did knowingly, willfully, and unlawfully transmit communications in interstate commerce, that is, a video posted on the internet website “Facebook” which traveled between the State of New York and the State of California, which contained a threat to injure the person of another, specifically, Victim 1, a person known to the Grand Jury.

All in violation of Title 18, United States Code, Section 875(c).

COUNT 2

(Cyberstalking)

The Grand Jury Further Charges That:

From on or about June 6, 2020, to on or about July 29, 2020, in the Western District of New York, and elsewhere, the defendant, **SAMUEL MARA**, with the intent to harass and intimidate another person, that is, Victim 1, a person known to the Grand Jury, did use an electronic communication service, an electronic communication system of interstate commerce, and a facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Victim 1.

All in violation of Title 18, United States Code, Section 2261A(2)(B).

DATED: Buffalo, New York, November 17, 2020.

JAMES P. KENNEDY, JR.
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A TRUE BILL:

S/FOREPERSON